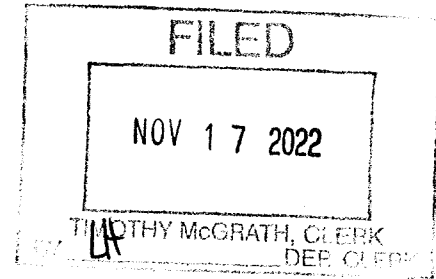


Clerk, U.S. Bankruptcy Court
The Gateway Building
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Reading, Pa. 19601

Timothy Billig
7861 Springhouse Road
New Tripoli, Pa. 18066



Response to motion for Kevin K. Kercher, Attorney
Bankruptcy Case # 20-12771

I do not have a lawyer yet to proceed with my case.

In # 8 of Kevin Kercher's motion, I Tim, did contact another counselor, just to see if what Mr. Kercher was saying on any of the matters that I was concerned about, was this the way we should proceed on my matters. And was Kevin Kercher doing the best in taking care of these matters. As Mr. Kercher has said we had him since June 25, 2020 for Chapter 12. Before this and in 2019 we had him for Chapter 13. Which he, Mr. Kercher took us out of when things were not really settled with Fulton Bank. But Mr. Kercher felt that the bank would wait for payment from the Nationwide Insurance claim, once that was settled. But it did not get settled and it kept on dragging from one month to another for years. To this day I never saw a bill from Mr. Kercher for Chapter 13.

Then a friend of my wife's called her, and asked her if she knew that our farm was up for sheriff sale on Friday. She called Mr. Kercher and asked him what was going on and his response was – can't be but I'll check on it. A day later he called and told my wife Teresa, yes in fact it was up for sheriff sale this Friday, and to stop it he would have to file for bankruptcy again. He said we needed to come down and sign papers ASAP. So, my wife and I signed papers so he could write up a plan and get it back into bankruptcy. We never knew what we signed for until after it was filed. But this did keep us from sheriff sale. I honestly believe that Mr. Kercher thought that things would get settled with Nationwide Insurance. And that we would be able to pay off Fulton Bank and all the other creditors. But it never went that way. So, we had a plan that we did not really agree on, I had told Kevin Kercher that I could not pay more than \$2,000.00 a month. Because we no longer had an income from the hogs. But I ended up paying \$2,662.00 a month to Fulton

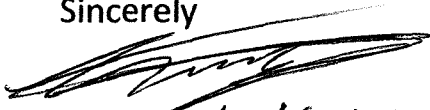
Bank just for the interest, \$1,844.00 to FSA so I hardly had anything left for any of the regular bills. Our plan told us that we had to hire a real estate agent to sell the property. Which we did, in hopes of keeping it from being put on sheriff sale again.

#10 of the documents I feel was a misunderstanding on Kim Bonefant's (real estate agent) part. Se was not always with the gentlemen that came to look at the property and neither was my wife. She had told my wife when selling a property, it is best if the seller didn't say much, on account of keeping the price where we wanted it, but she did not tell me these things. So, my wife stayed back and, on an occasion, she would come over to talk to me and the buyers. I knew one of the buyers' fathers Mr. John Wagner – Mr. Jeff Wagner - buyer. They got to talking about the pig industry and how it was doing today. They rehashed over times when we were still in the business, and all the changes in the hog industry. This is when I said, talking about Tom Pastor PIC agent, who was the person that sold us our starting up gilts. That he didn't know what the hell he was talking about back then, and that (he could go pound sand himself). That I never believed in his PIC breed, but that's what the industry wanted. And I said "you can tell him that too". The buyers and I did a lot of talking about the pig industry, and they all knew who I was talking about when I mentioned Tom Pastor. My wife Teresa did hear part of the conversations and she knew who I was talking about and that we were talking hogs. She had gone over to my son George to talk to him about the building that housed the finished hogs, and how bad the slats were. But the real estate lady Kim Bonefant also went over to my wife, Teresa to talk to her. So, I don't know when she would have heard me say Kevin Kercher's name. Because I didn't say his name at all. Or did she just think I was talking about him. I had also said to her Kim Bonefant that she didn't know everything either about my situation. So was she just upset with me. I do know. She told my wife that she was upset with me because I told them to much about Fulton Bank and what happened that I am in these shoes.

Another reason I was upset with Kevin Kercher was the situation with my mother Nancy Billig. Who says that I owe her \$90,000.00 for the farm. My wife has enough of information that says we paid the farm, through bank records, and our records. My wife was living in South Carolina last year and came up in August, because Kevin was supposed to have everything ready to straighten out this claim with my mother, Nancy Billig. Kevin did nothing at that time so she went back to South Carolina, very frustrated, and disappointed because that's the reason she came up to Pennsylvania. Ever since we are in bankruptcy, I have been trying to

get my mother's claim settled. I kept saying to Kevin she better not get paid anything since we did not settle the claim yet. Kevin kept telling me that she isn't because it's in the plan that it had to be settled first before she got paid. Nothing had happened to this day yet. I talked to other lawyers about this and they all felt that it should have been taken care of already. That's when I found out through my divorce lawyer that my mother was paid \$28,000.00 already. So, my wife called Mr. Waterman because we couldn't get a hold of Kevin Kercher, to find out if she got paid anything. That's when she found out that she did get paid the sum of \$28,000.00. When my wife called Kevin Kercher, he didn't know Nancy Billig was paid. He insisted she wasn't, and said he would find out for sure. He did and he let us know that the amount would have to be paid back. There were to many times that he did not explain things to us. So, I feel it should be understandable why I questioned the things Kevin Kercher was doing.

Sincerely


11-16-22

Billig

Timothy Billig